



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 23, 2020

By Email and ECF

Andrew J. Frisch
One Penn Plaza, Suite 5315
New York, NY 10119

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (S-1) (EK)

Dear Mr. Frisch:

The government provides supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure and additional pretrial disclosures.

First, the government previously produced and made available for inspection, by letter dated May 1, 2019, the materials seized by Bulgarian authorities from the defendant's apartment. See ECF No. 44. Included in the previous production was a scanned copy of documents seized from the apartment, Bates-stamped ZHU000021 to ZHU000226. Enclosed is a scanned copy of seven additional pages of documents seized from the apartment (that were not a part of the previous scan), Bates-stamped **ZHU006584 to ZHU006590**.

Second, the government hereby provides written notice that it intends to offer business records provided by Dropbox and Interactive Brokers Limited via certification pursuant to Federal Rules of Evidence 902(11) and 902(12). Those certifications are enclosed.

Finally, the government notes that it previously provided discovery to the defense by letter dated August 12, 2019, but that letter was not filed on the docket in this

case. The government is filing herewith the discovery cover letter for the August 12, 2019 production for purposes of the record.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
 Saritha Komatireddy
 Michael T. Keilty
 Alexander F. Mindlin
 Assistant U.S. Attorneys
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Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)